

# EXHIBIT 15

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September 24, 2021

**By Electronic Mail**

Jim Etheridge  
Etheridge Law Group, PLLC  
2600 E. Southlake Blvd., Suite 120/324  
Southlake, Texas, 76092  
jim@etheridgelaw.com

**Re: WSOU Investments LLC v. Google LLC, No. 20-585 (W.D. Texas)**

Dear Mr. Etheridge:

In an effort to continue moving discovery forward, we provide the following additional information regarding depositions WSOU seeks to take in this matter.

In response to WSOU'S 30(b)(6) Notice to Google in the above-captioned case, Google preliminarily discloses the following witnesses, and initial topic designations, subject to our objections served September 22, 2021:

- Google designates Payam Pakzad in this case to testify regarding Topics 1,7 (as to facts and documents identified in response to Interrogatory No. 3), 11-19, 42, 45, and 48 with respect to Google's Android Awareness Fence and Snapshot APIs. Mr. Pakzad will be made available on October 14, 2021.
- Google designates Reto Meier in this case to testify regarding Topics 7 (as to facts and documents identified in response to Interrogatory No. 1), 19, 27, 35-36, 40-41,47, 50-51,and 54 with respect to Google's Android Awareness Fence and Snapshot APIs. Mr. Meier will be made available on October 19, 2021.
- Google designates John Yoo in this case to testify regarding Topics Topics 7 (as to facts and documents identified in response to Interrogatory No. 4), 28-34, and 37-38 with respect to Google's Android Awareness Fence and Snapshot APIs. Mr. Yoo will be made available on October 12, 2021.
- Google designates Jim Maccoun in this case to testify regarding Topics 2, 7 (as to fact and documents identified in response to Interrogatory Nos. 6 and 7), 21-26, and 63. As stated previously, and subject to the parties agreement on the number of deposition hours in the cases pending between them, Mr. Maccoun is available for deposition beginning October 19, 2021.

Google reserves the right to modify these disclosures, including with respect to the topic designations.

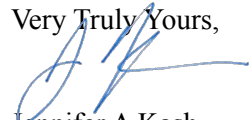
In addition to the depositions above, Google also will produce the following witnesses pursuant to the 30(b)(1) notices served by WSOU in the above-captioned case:

- Brian Duddie, on October 13, 2021.
- Jeffrey Hightower, on October 21, 2021.
- Matthew Gubiotti, on October 15, 2021, as noticed in WSOU's 30(b)(1) notice of deposition.
- Wyatt Riley, on October 13, 2021.

Each of the above witnesses will be offered via Google Meet, as previously agreed to by and between the parties. Protective Order, at par. 16. Once the depositions are confirmed, Google will provide the necessary information to conduct remote depositions using Google Meet and Google Drive. We assume that the depositions will begin at 9 a.m. Pacific time, but will take that up on a case by case basis dependent on the witness location. Unless otherwise discussed and agreed by the parties, no witness disclosed herein shall be made available for longer than seven hours.

Thank you for your continued time and courtesy in this matter.

Very Truly Yours,



Jennifer A Kash